



# **CODE OF CONDUCT & ETHICS**

**Version 1.0**

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## 1. Introduction

VETECE Holdings Berhad and all subsidiaries (collectively known as "VTC") and its employees must, at all times, comply with all applicable laws and regulations. VTC will not condone the activities of employees who achieve results through violation of the laws or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery.

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing VTC's operations.

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their superior and/or senior management, who, if necessary, would seek appropriate legal advice.

The Code of Conduct & Ethics is the foundation on which our business integrity rests and it defines our standards for doing business on fair terms.

## 2. General Employee Conduct

VTC expects its Personnel to conduct themselves in a business like manner.

Any type of harassment and violence will not be tolerated. These actions or behaviors include derogatory comments based on gender, racial or ethnic characteristics, unwelcomed sexual advances, spreading of malicious rumours, use of emails, voicemail and other forms of communication channels to transmit derogatory or discriminatory materials. All employees and managers are required to comply with all anti-harassment laws in the locations where they work. Subject to applicable laws and regulations, VTC prohibit the possession and/or use of firearms, other weapons, explosive devices and/or other dangerous materials on the VTC premises or while conducting its business.

## 3. Conflicts of Interest

VTC expects its employees to perform their duties conscientiously, honestly, and in accordance with the best interests of VTC. A conflict of interest arises when a personal interest exists and can be seen to influence or interfere with a person's objectivity in performing duties or exercising judgement on behalf of VTC. Personnel are not to use their positions or knowledge gained as a result of their positions for private or personal advantage. Regardless of the circumstances, if the Personnel sense that an action they have pursued, or are presently pursuing, or are contemplating in pursuing may create a conflict of interest with their employer, they should immediately communicate all the facts to their superior and/or senior leadership team. Failure to declare any conflict of interest may result in disciplinary action against the Personnel.

## 4. Outside Activities, Employment, and Directorships

As a full-time Employee, you must not take up employment outside VTC or engage in any outside business or service which may be in competition with VTC or give rise to actual or potential conflict of interest. All employees share a serious responsibility towards VTC's good public relations, especially at the community level. Their readiness to help with religious, charitable, educational, and civic activities brings credit to VTC and is encouraged. Employees must, however, avoid acquiring any business interest or participating in any other activity outside VTC that would, or would appear to:

- Create an excessive demand upon their time and attention, thus depriving VTC of their best efforts on the job.
- Create a conflict of interest - an obligation, interest, or distraction - that may interfere with the independent exercise of judgment in VTC's best interest.

## 5. Relationships with Clients and Suppliers

Employees should avoid investing in or acquiring a financial interest for their own accounts in any business organisation that has a contractual relationship with VTC, or that provides goods or services, or both, to VTC if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of VTC.

## 6. Gifts, Entertainment, and Favours

Employees must not accept entertainment, gifts, or personal favours that could, in any way, influence, or appear to influence, business decisions in favour of any person or organisation with whom or with which VTC has, or is likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their positions with VTC might be inclined to, or be perceived to, place them under an obligation to return the preferential treatment.

## 7. Kickbacks and Secret Commissions

Regarding the VTC's business activities, employees may not receive payment or compensation of any kind, except authorized commission under the organisation's business and payroll policies. In particular, LGMS Group strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

## 8. Organisation Funds and Other Assets

Employees who have access to VTC funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in VTC's policies and procedures or other explanatory materials, or both. VTC applies strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud and dishonesty, they should immediately advise their superior and/or senior management team and they may seek appropriate legal guidance to enable VTC in its investigation. When an employee's position requires the incurrence of such expenditure for VTC, that individual must use good judgment on the VTC's behalf to ensure that good value is received for every expenditure spent. Monies and all other assets of VTC are purposed for VTC only and not for personal benefit. This includes the personal use of assets, such as computers or vehicles or any other assets owned by VTC.

### 9. Organisation Records and Communications

Accurate and reliable records of many kinds are necessary to meet the legal and financial obligations of VTC and in managing the affairs of VTC. The employees responsible for accounting and record keeping must fully disclose and record all assets, liabilities, in a timely and accurate manner and must exercise diligence in enforcing these requirements.

Employees must not make or engage in any false recording or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

### 10. Dealing with Outside People and Organisations

Employees must take care to separate their personal roles from VTC positions when communicating on matters not involving VTC business.

Employees must not use VTC identification, stationery, supplies, and equipment for personal or political matters.

When communicating publicly on matters that involve VTC business, employees must not presume to speak for VTC on any topic, unless they are certain that the views they express are those of VTC and it is the VTC's desire that such views be publicly disseminated.

When dealing with anyone outside VTC, including public officials, employees shall exercise care and diligence so to not to compromise the integrity or damage the reputation of VTC, and/or the individual.

If in doubt, refrain from giving any comments and seek feedback from senior management team soonest possible.

### 11. Prompt Communications

In all matters relevant to customers, suppliers, government authorities, the public and others in VTC, all employees must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints. If in doubt, refrain from giving any comments and seek feedback from senior management team soonest possible.

### **12. Privacy and Confidentiality**

When handling financial and personal information about customers or others with whom VTC has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for VTC's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources for this purpose.
- Retain information only for as long as necessary or as required by law. Protect the security of this information.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.